

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CRAIG GOULET

Plaintiff,

v.

NEW PENN MOTOR EXPRESS

Defendant

and

TEAMSTERS LOCAL 25

**INTERNATIONAL BROTHERHOOD OF
TEAMSTERS**

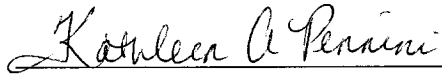
Defendant,

**CIVIL ACTION
NO. 04-12577-JLT**

DEFENDANT, TEAMSTERS LOCAL 25'S MOTION FOR SUMMARY JUDGMENT

Now come the Defendant, Teamsters, Local 25, International Brotherhood of Teamsters (hereinafter "Defendant"), pursuant to Rule 56 of the Federal Rules of Civil Procedure hereby move this Honorable Court for the entry of a summary judgment in their favor. As grounds for their motion the Defendant states that there is no genuine issue as to any material fact that it are entitled to judgment as a matter of law. The Defendant further relies on materials submitted herewith and the attached memorandum of law in support of its motion.

For the Defendant,
**INTERNATIONAL BROTHERHOOD OF
TEAMSTERS, LOCAL UNION NO. 25,**
By its attorneys,



Matthew E. Dwyer (B.B.O. # 139840)
Kathleen A. Pennini (b.B.O. # 654573)
Dwyer, Duddy and Facklam, P.C.
Two Center Plaza, Suite 430
Boston, MA 02108-1804
(617) 723-9777

Date: January ²⁴~~23~~, 2006

CERTIFICATE OF SERVICE

I, Kathleen A. Pennini, do hereby certify I have electronically ^{filed} filed this motion on January ²⁴~~23~~, 2006, with delivery to :

Scott Lathrop, Esq.
Scott A. Lathrop & Associates
122 Old Ayer Road
Groton, MA 01450

Carl H. Gluek, Esq.
Frantz Ward, LLP
55 Public Square Building, 19th Floor
Cleveland, OH 44113-1999


Kathleen A. Pennini